

1 THOMAS P. BEKO, ESQ. (#002653)  
2 ERICKSON, THORPE & SWAINSTON, LTD.  
3 99 West Arroyo Street  
P.O. Box 3559  
3 Reno, Nevada 89505  
Telephone: (775) 786-3930  
4 *Attorneys for Defendant*

5

6 **UNITED STATES DISTRICT COURT**  
7 **DISTRICT OF NEVADA**

8

9 ANGELICA MARIA KEATING,  
individually; KIMBERLY ELAINE  
10 KEATING, individually; ALICIA  
DOMINGUEZ KEATING, individually,

Case No.: 2:14-cv-01632-JAD-GWF

11 Plaintiffs,

12 vs.

13 ROBERT GLENNEN, III, individually,

14 Defendant .

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15 **STIPULATION FOR ENTRY OF ORDER TO PRODUCE RECORDS**

16 COME NOW, Plaintiffs, ANGELICA MARIA KEATING, KIMBERLY ELAINE  
17 KEATING, and ALICIA DOMINGUEZ KEATING, by and through their attorneys,  
18 Parker/Scheer Lagomarsino, and Andre M. Lagomarsino, Esq., and Defendant, ROBERT  
19 GLENNEN, III, by and through his attorneys, Erickson, Thorpe & Swainston, Ltd., and  
20 Thomas P. Beko, Esq., and hereby stipulate to the entry of the attached proposed order  
21 directing the State of Nevada, Department of Health and Human Services, Division of Public  
22 and Behavioral Health to produce a certified copy of the Affidavit/Declaration of Paternity  
23 signed by the plaintiff, Angelica Maria Keating, regarding Alicia Denise Bennet, a minor  
24 child.

25 The parties stipulate that this action arises as a result of actions taken by the defendant  
26 Glennen to prosecute the plaintiff for alleged violations of Nevada law, some of which  
27 pertained to her removal of a minor child from this state. While the Nevada Department of

Erickson, Thorpe & Swainston, Ltd.  
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1 Health and Human Services has indicated that it has in its file a copy of the pertinent  
2 Affidavit/Declaration of Paternity, they have declined requests to produce a copy of that  
3 document absent a court order. *See, attached Exhibit 1.* The parties have agreed to the entry  
4 of the attached proposed order compelling the production of the document. Pursuant to  
5 Nevada Revised Statues, § 440.170(2), such records may only be disclosed upon order of a  
6 court of competent jurisdiction.

7 As the parties agree that good cause exists for the production of this record, the parties  
8 request this Court to enter the proposed order attached hereto as Exhibit 2.  
9

10 Dated this 20<sup>th</sup> day of May, 2015. Dated this 20<sup>th</sup> day of May, 2015.

11 PARKER/SCHEER LAGOMARSINO ERICKSON, THORPE & SWAINSTON, LTD.  
12

13 By: /s/ Andre M. Lagomarsino, Esq.  
14 Andre M. Lagomarsino, Esq.  
15 *Attorneys for Plaintiffs*

By: /s/ Thomas P. Beko, Esq.  
Thomas P. Beko, Esq.  
16 *Attorneys for Defendant*

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1                   CERTIFICATE OF SERVICE

2                   Pursuant to FRCP 5(b), I certify that I am an employee of ERICKSON, THORPE &  
3 SWAINSTON, LTD., and that on this day I personally served a true and correct copy of the  
4 foregoing *Stipulation for Entry of Order to Produce Records* on all parties in this action by  
5 Electronic Mail through the United States District Court's CM/ECF Filing System.

6                   Dated this 20<sup>th</sup> day of May, 2015.

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9                   Dana Matthews

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## **EXHIBIT 1**

## **EXHIBIT 1**

BRIAN SANDOVAL  
*Governor*

STATE OF NEVADA

MARTA E. JENSEN  
*Acting Administrator*

RICHARD WHITLEY, MS  
*Interim Director*

TRACEY D. GREEN, MD  
*Chief Medical Officer*



DEPARTMENT OF HEALTH AND HUMAN SERVICES  
DIVISION OF PUBLIC AND BEHAVIORAL HEALTH  
4150 Technology Way, Suite 104  
Carson City, Nevada 89706  
(775) 684-4242 Fax (775) 684-4156

Date: April 14, 2015

To: Thomas Beko  
PO Box 3559  
Reno, NV 89505

Name of Child: Alicia Denise BENNETT

Date of Birth: June 10, 2011

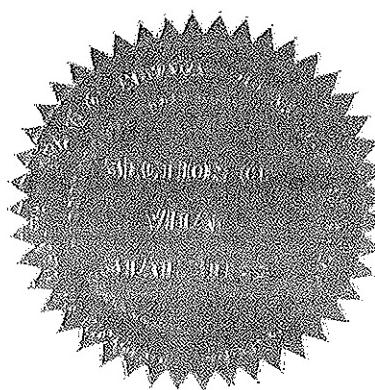
Place of Birth: Las Vegas, Nevada

Please be advised that we have on file in this office an Affidavit/Declaration of Paternity signed by, **Jody Foy Bennett**, who states himself to be the father of the above named child and signed by the mother **Angelica Maria Keating**. This statement was filed in our office on **June 30, 2011**.

This is to certify the above stated facts are true and correct.

By: Pam Gillian

Pam Gillian  
Administrative Asst. II



**EXHIBIT 2**

**EXHIBIT 2**

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**UNITED STATES DISTRICT COURT**  
6  
**DISTRICT OF NEVADA**  
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9 ANGELICA MARIA KEATING,  
10 individually; KIMBERLY ELAINE  
11 KEATING, individually; ALICIA  
12 DOMINGUEZ KEATING, individually,

Case No.: 2:14-cv-01632-JAD-GWF

13 Plaintiffs,  
14  
15 vs.  
16

17 ROBERT GLENNEN, III, individually,  
18  
19 Defendant .  
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**ORDER TO PRODUCE AFFIDAVIT/DECLARATION OF PATERNITY**

23 Based upon the stipulation of parties hereto, and good cause appearing,

24 IT IS HEREBY ORDERED that the Department of Health and Human Services,  
25 Division of Public and Behavioral Health, State of Nevada, shall produce a certified copy of  
26 the Affidavit/Declaration of Paternity signed by plaintiff, Angelica Maria Keating, regarding  
27 Alicia Denise Bennett, a minor child, to Thomas Beko, Esq., 99 West Arroyo Street, Reno,  
28 Nevada 89509.

29 Dated this 21st day of May, 2015.

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32 United States Magistrate Judge  
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